

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

JAN 27 2016

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
 JON THOMAS WHITE,)
)
 Defendant.)
)

No. 4:16CR0042 RWS/PLC

INDICTMENT

THE GRAND JURY CHARGES:

COUNT I

[ILLEGAL TRANSACTIONS WITH AN ACCESS DEVICE]

On or about June 25, 2014 and afterward, in the Eastern District of Missouri, the defendant

JON THOMAS WHITE,

knowingly and with intent to defraud, effected transactions with an access device, to wit, the date of birth and social security number xxx-xx-8296, issued to another person, N.T., by applying for a credit card processing account for a fictitious business, to receive credit card payments, from on or about June 25, 2014, and ending on or about August 20, 2014, of a value in excess of \$1,000, said conduct affecting interstate and foreign commerce, in that the credit card processing company located outside the State of Missouri processed credit card payments and made electronic deposits into a bank account located in Missouri that was controlled by the defendant, in violation of 18 U.S.C. Section 1029(a)(5) and (c)(1)(a)(ii).

COUNT II

[AGGRAVATED IDENTITY THEFT]

On or about June 25, 2014, in the Eastern District of Missouri, the defendant,

JON THOMAS WHITE,

did knowingly possess, without lawful authority, a means of identification of another person during and in relation to a felony violation as charged in Count I and enumerated in 18 U.S.C. § 1028A(c), to wit conducting illegal transactions with an access device in violation of 18 U.S.C. § 1029(a)(5), knowing that the means of identification belonged to another actual person, in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT III

[ILLEGAL TRANSACTIONS WITH AN ACCESS DEVICE]

On or about September 2, 2014 and afterward, in the Eastern District of Missouri, the defendant

JON THOMAS WHITE,

knowingly and with intent to defraud, effected transactions with an access device, to wit, the date of birth and social security number xxx-xx-6190, issued to another person, T.S., by applying for a credit card processing account for a fictitious business, to receive credit card payments, from on or about September 2, 2014, and ending on or about November 3, 2014, of a value in excess of \$1,000, said conduct affecting interstate and foreign commerce, in that the credit card processing company located outside the State of Missouri processed credit card payments and made electronic deposits into a bank account located in Missouri that was controlled by the defendant, in violation of 18 U.S.C. Section 1029(a)(5) and (c)(1)(a)(ii).

COUNT IV

[AGGRAVATED IDENTITY THEFT]

On or about September 2, 2014, in the Eastern District of Missouri, the defendant,

JON THOMAS WHITE,

did knowingly possess, without lawful authority, a means of identification of another person during and in relation to a felony violation as charged in Count III and enumerated in 18 U.S.C. § 1028A(c), to wit conducting illegal transactions with an access device in violation of 18 U.S.C. § 1029(a)(5), knowing that the means of identification belonged to another actual person, in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT V

[ILLEGAL TRANSACTIONS WITH AN ACCESS DEVICE]

On or about September 6, 2014 and afterward, in the Eastern District of Missouri, the defendant

JON THOMAS WHITE,

knowingly and with intent to defraud, effected transactions with an access device, to wit, the date of birth and social security number xxx-xx-2262, issued to another person, C.P., by applying for a credit card processing account for a fictitious business, to receive credit card payments, from on or about September 6, 2014, and ending on or about September 17, 2014, of a value in excess of \$1,000, said conduct affecting interstate and foreign commerce, in that the credit card processing company located outside the State of Missouri processed credit card payments and made electronic deposits into a bank account located in Missouri that was controlled by the defendant, in violation of 18 U.S.C. Section 1029(a)(5) and (c)(1)(a)(ii).

COUNT VI

[AGGRAVATED IDENTITY THEFT]

On or about September 6, 2014, in the Eastern District of Missouri, the defendant,

JON THOMAS WHITE,

did knowingly possess, without lawful authority, a means of identification of another person during and in relation to a felony violation as charged in Count V and enumerated in 18 U.S.C. § 1028A(c), to wit conducting illegal transactions with an access device in violation of 18 U.S.C. § 1029(a)(5), knowing that the means of identification belonged to another actual person, in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT VII

[UNLAWFUL PRODUCTION OF AN IDENTIFICATION DOCUMENT]

On or about January 7, 2015, in the Eastern District of Missouri, the defendant,

JON THOMAS WHITE,

did knowingly and without lawful authority produce an identification document, authentication feature, or a false identification document, to wit, a Missouri driver's license bearing the defendant's picture, but with the name and address of S.K., the production of the identification document, authentication feature, or false identification document was in or affected interstate or foreign commerce in that the defendant faxed a copy of said license out-of-state in connection with a merchant credit card processing application, and the offense involved the production of an identification document, authentication feature, or false identification document that is or appears to be a driver's license or personal identification card, all in violation of 18 United States Code Section 1028(a)(1) and (b)(1)(A)(ii).

COUNT VIII

[AGGRAVATED IDENTITY THEFT]

On or about January 7, 2015, in the Eastern District of Missouri, the defendant,

JON THOMAS WHITE,

did knowingly possess, without lawful authority, a means of identification of another person during and in relation to a felony violation as charged in Count VII and enumerated in 18 U.S.C. § 1028A(c), to wit the unlawful production of an identification document or authentication feature in violation of 18 U.S.C. § 1028(a)(1), knowing that the means of identification belonged to another actual person, in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT IX

[ILLEGAL TRANSACTIONS WITH AN ACCESS DEVICE]

On or about May 30, 2015 and afterward, in the Eastern District of Missouri, the defendant

JON THOMAS WHITE,

knowingly and with intent to defraud, effected transactions with an access device, to wit, the date of birth and social security number xxx-xx-3339, issued to another person, J.B., by applying for a credit card processing account for a fictitious business, to receive credit card payments, from on or about May 30, 2015, and ending on or about June 5, 2015, of a value in excess of \$1,000, said conduct affecting interstate and foreign commerce, in that the credit card processing company located outside the State of Missouri processed credit card payments and made electronic deposits into a bank account located in Missouri that was controlled by the defendant, in violation of 18 U.S.C. Section 1029(a)(5) and (c)(1)(a)(ii).

COUNT X

[AGGRAVATED IDENTITY THEFT]

On or about May 30, 2015, in the Eastern District of Missouri, the defendant,

JON THOMAS WHITE,

did knowingly possess, without lawful authority, a means of identification of another person during and in relation to a felony violation as charged in Count IX and enumerated in 18 U.S.C. § 1028A(c), to wit conducting illegal transactions with an access device in violation of 18 U.S.C. § 1029(a)(5), knowing that the means of identification belonged to another actual person, in violation of Title 18, United States Code, Section 1028A(a)(1).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Section 982(a)(2)(B) and 1029(c)(1)(C), upon conviction of an offense in violation in violations of Title 18, United States Code, Sections 1028 and 1029 set forth in Counts I, III, V, VII and IX of this Indictment, the defendant, **JON THOMAS WHITE**, shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation(s) and any personal property used or intended to be used to commit the offense.

2. Subject to forfeiture is a sum of money equal to the value of the property constituting, or derived from proceeds the defendant obtained directly or indirectly as a result of such violation.

3. If any of the property described above, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

Dated: _____

A TRUE BILL

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

Gilbert C. Sison
Assistant United States Attorney